

1 MICHAEL C. KANE, ESQ.
Nevada Bar No. 10096
2 BRADLEY J. MYERS, ESQ.
Nevada Bar No. 8857
3 JOEL S. HENGSTLER, ESQ.
Nevada Bar No. 11597
4 **THE702FIRM INJURY ATTORNEYS**
8335 West Flamingo Road
Las Vegas, Nevada 89147
5 Telephone: (702) 776-3333
Facsimile: (702) 505-9787
6 **E-Mail:** service@the702firm.com

7 GEOFFREY C. PARKER
Nevada Bar No. 16952
8 **HILTON PARKER LLC**
7658 Slate Ridge Boulevard
9 Reynoldsburg, Ohio 43068
Telephone: (614) 992-2277
10 Facsimile: (614) 927-5980
11 **E-Mail:** gparker@hiltonparker.com

12 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

13 CHRISTINA T., pseudonymously,
14 Plaintiff,
15 vs.
16 BELLAGIO LLC, et al.,
17 Défendants.

Case No. : 2:25-cv-00145-JCM-DJA

STIPULATION AND ORDER FOR
EXTENSION OF TIME TO SEEK
LEAVE TO AMEND COMPLAINT

(FIRST REQUEST)

18 Plaintiff Christina T. ("Plaintiff") and Defendants Bellagio LLC; Desert Palace LLC;
19 Nevada Property 1 LLC; Mandalay Bay Resort Group LLC; MGM Grand Hotel LLC; MGM
20 Grand Propco LLC; Venetian Las Vegas Gaming, LLC; Wynn Las Vegas, LLC; and Resorts
21 World Las Vegas, LLC (collectively "Defendants" and, together with Plaintiff, the "Parties"), by
22 and through her their respective of record, hereby agree and stipulate as follows:

23 1. On October 17, 2025, the Court granted Defendants' motions to dismiss Plaintiff's
24 First Amended Complaint (ECF Nos. 55–58, 75) and gave Plaintiff 21 days to seek leave to amend
25 her complaint. (ECF No. 79.)

26 2. Plaintiff's current deadline to seek leave to amend her complaint and attach the
27 proposed amended complaint is November 10, 2025. Defendants' deadline to file responses thereto
28 would be November 24, 2025.

3. The Parties agree, stipulate, and respectfully request that the Court extend the deadline for Plaintiff to seek leave to file an amended complaint by seven (7) days, making her new deadline to November 17, 2025.

4. The Parties further agree, stipulate, and respectfully request that the Court extend the deadline for Defendants to file their responses (if any) to Plaintiff's motion for leave to amend her complaint by seven (7) days, placing each Defendant's response deadline twenty-one (21) days after the deadline for Plaintiff's motion: December 8, 2025.

5. Good cause exists for this extension. Plaintiff's counsel requires additional time to prepare her Second Amended Complaint because Plaintiff's counsel has three separate responses to motions for summary judgment—in three complex and unrelated matters—due during the week preceding the present deadline. Two of these responses are due on Friday, November 7, just three days before the Monday November 10 deadline for Plaintiff to seek leave to amend and attach her proposed Second Amended Complaint.

6. This extension is necessary to provide the Plaintiff's counsel sufficient time to amend her complaint, and a reciprocal extension of Defendants' time to respond is appropriate due to the adjustment for Plaintiff's motion deadline that would require Defendants to brief the issues raised in the motion for leave across the Thanksgiving holiday.

7. This is the first stipulation for an extension of the time for Plaintiff to file her motion for leave to amend her complaint, and it is also the first stipulation for an extension of the time for Defendants to file their responses in response thereto.

IT IS SO STIPULATED.

DATED this 3rd day of November, 2025.

Respectfully submitted,

/s/ Geoffery C. Parker
GEOFFREY C. PARKER, ESQ.
Nevada Bar. No. 16952
HILTON PARKER LLC
Ohio Bar No. 0095742
7658 Slate Ridge Boulevard
Reynoldsburg, Ohio 43068
MICHAEL C. KANE, ESQ.

/s/ Nichole M. Perry
Nicole M. Perry, Esq. (*Pro Hac Vice*)
JONES DAY
717 Texas Street, Suite 3300
Houston, TX 77002
Telephone: (832) 239-3939
Facsimile: (832) 239-3600
Email: nmperry@jonesday.com

Nevada Bar No. 10096
BRADLEY J. MYERS, ESQ.
Nevada Bar No. 8857
JOEL S. HENGSTLER, ESQ.
Nevada Bar No. 11597
THE702FIRM INJURY ATTORNEYS
8335 West Flamingo Road
Las Vegas, Nevada 89147

Counsel for Plaintiff Christina T.

Bethany K. Biesenthal, Esq. (*Pro Hac Vice*)
Allison L. McQueen, Esq. (*Pro Hac Vice*)
JONES DAY
110 North Wacker Drive, Suite 4800
Chicago, IL 60606
Telephone: (312) 782-3939
Facsimile: (312) 782-8585
Email: bbiesenthal@jonesday.com
amcqueen@jonesday.com

Patrick G. Byrne, Esq.
Nevada Bar No. 7636
Dawn Davis, Esq.
Nevada Bar No. 13329
SNELL & WILMER
1700 South Pavilion Center Drive, Suite 700
Las Vegas, NV 89135
Telephone: (702) 784-5275
Facsimile: (702) 784-5252
Email: pbyrne@swlaw.com
ddavis@swlaw.com

Counsel for Defendant Wynn Las Vegas, LLC

/s/ Nathanael R. Rulis
Nathanael R. Rulis, Esq.
Nevada Bar No. 11259
KEMP JONES, LLP
3800 Howard Hughes Parkway, Suite 1700
Las Vegas, NV 89169
Telephone: (702) 385-6000
Facsimile: (702) 385-6001
Email: n.rulis@kempjones.com

David Sager, Esq. (*Pro Hac Vice*)
DLA PIPER LLP (US)
51 John F. Kennedy Parkway, Suite 120
Short Hills, NJ 07078
Telephone: (973) 520-2570
Facsimile: (973) 520-2551
Email: david.sager@dlapiper.com

Kyle T. Orne, Esq. (*Pro Hac Vice*)
DLA PIPER LLP (US)
2525 East Camelback Road, Suite 1000
Phoenix, AZ 85016
Telephone: (480) 606-5172
Facsimile: (480) 606-5527
Email: kyle.orne@dlapiper.com
*Counsel for Defendant Venetian Las Vegas
Gaming, LLC*

/s/ Kristen T. Gallagher
Kristen T. Gallagher, Esq.
Nevada Bar No. 9561
MCDONALD CARANO LLP
2300 W. Sahara Ave., Suite 1200
Las Vegas, NV 89102
Telephone: (702) 873-4100
Email: kgallagher@mcdonaldcarano.com

Ann H. MacDonald, Esq. (*Pro Hac Vice*)
ARENTFOX SCHIFF LLP
233 S. Wacker Drive, Suite 7100
Chicago, IL 60606
Telephone: (312) 258-5548
Facsimile: (312) 258-5600
Email: ann.macdonald@afslaw.com

Elise Yu, Esq. (*Pro Hac Vice*)
ARENTFOX SCHIFF LLP
350 South Main Street, Suite 210
Ann Arbor, MI 48104
Telephone: (734) 222-1556
Facsimile: (734) 222-1501
Email: elise.yu@afslaw.com
Counsel for Defendants Desert Palace LLC

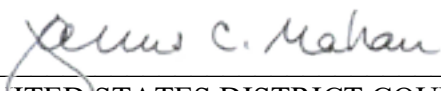
/s/ Robert A. Ryan

Robert A. Ryan, Esq.
Nevada Bar No. 12084
KNIGHT & RYAN PLLC
8880 W. Sunset Rd., Suite 130
Las Vegas, NV 89148
Telephone: (702) 462-6083
Facsimile: (702) 462-6048
Email: robert@knightryan.com
*Counsel for Defendants Bellagio LLC, Nevada
Property 1, LLC, Mandalay Bay Resort Group
LLC, MGM Grand Hotel LLC, and MGM
Grand Propco LLC*

/s/ Justin W. Smerber

Justin W. Smerber, Esq.
Nevada Bar No. 10761
BRANDON SMERBER LAW FIRM
139 East Warm Springs Road
Las Vegas, NV 89119
Telephone: (702) 380-0007
Facsimile: (702) 380-2964
Email: j.smerber@bsnv.law
*Counsel for Defendant Resorts World Las
Vegas, LLC*

IT IS SO ORDERED.


UNITED STATES DISTRICT COURT JUDGE

DATED: November 4, 2025